NATIONAL EMERGENCY NUMBER ASSOCIATION

DOCKET FILE COPY ORIGINAL

North Carolina Chapter

Roy D. Meredith, Past President & Newsletter Editor

P.O. Box 429, High Point, NC 27261-0429 / Phone: 910-885-2899 / FAX: 910-883-3400

Comments On Docket 94-102

January 05, 1995

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M. Street NW, Room 222
Washington, DC 20554

Dear Mr. Canton:

On behalf of the Executive Board and general membership of the ***North Carolina Chapter of the National Emergency Number Association (NENA)***, please enter the enclosed comments in support of the APCO/NENA/NASNA position regarding the proposed rule making to insure the compatibility of wireless devices and PBX systems with Enhanced 9-1-1 Emergency Telephone Number Systems (CC Docket No. 94-102).

Thank you very much for your attention to this matter.

Cordially,

Roy Meredith

Roy D. Meredith,
Past President
N.C. Chapter of NENA

Enclosures (9 Copies)

BEFORE THE

Federal Communications Commission

Washington, D.C. 20554

In The Matter Of

Revision Of The Commission's Rules To Insure Compatibility With Enhanced 9-1-1 Emergency Calling Systems.	)))))	CC Docket No. 94-102 RM-8143

To: The Commission

COMMENTS IN SUPPORT OF THE APCO/NENA/NASNA POSITION REGARDING THE PROPOSED RULE MAKING

Comment Date: January 9, 1995

Respectfully submitted,
North Carolina Chapter of NENA

Roy D. Meredith

Roy D. Meredith,
Past President
N.C. Chapter of NENA

P.O. Box 429
High Point, NC 27261-0429

Phone: 910-885-2899

Dated: January 5, 1995

INTRODUCTION

The ***North Carolina Chapter of the National Emergency Number Association (NENA)*** was formed in 1988, and currently has approximately 350 members.

The ***North Carolina Chapter of NENA's*** mission is the same as that of the ***National NENA*** organization: To foster the technological advancements, the availability, and implementation of a universal 9-1-1 Emergency Telephone System. In carrying out this mission, ***NENA*** promotes research, planning, training, and education in all aspects of the 9-1-1 agenda. Some of the objectives of ***NENA*** are the protection of human life, the preservation of property, and the maintenance of general community security.

The membership of the ***North Carolina Chapter of NENA*** includes people from a wide variety of backgrounds, responsibilities and experiences with 9-1-1 Emergency Telephone Systems. Our membership includes:

* Communications Center Managers
* Law Enforcement Personnel
* Emergency Medical Services Personnel
* Communications Equipment Vendors
* City, County, and Regional Planners
* Telecommunicators
* Fire Services Personnel
* Telephone Company Officials
* Telephone Equipment Vendors

Being so heavily involved in the installation and daily operations of Enhanced 9-1-1 Emergency Telephone Systems, we collectively see the urgent need for rules which would help to insure the compatibility of wireless and PBX system telephones with our Enhanced 9-1-1 Emergency Telephone Systems.

Just a few short years ago, it was rather unusual for our Enhanced 9-1-1 Public Safety Answering Points to receive an emergency telephone call from a wireless telephone. On the average, many of our Enhanced 9-1-1 Public Safety Answering Points in the State of North Carolina might have only received a hand full of calls each month from wireless telephones - even in our larger urban areas. Today, however, our Enhanced 9-1-1 Public Safety Answering Points typically receive **dozens of calls each day** from wireless telephones in the smaller rural areas of our State, and **hundreds of calls each day** and **thousands of calls each** month from wireless telephones in the larger urban areas of our State.

Many millions of dollars have been spent in the State of North Carolina installing and maintaining our Enhanced 9-1-1 Emergency Telephone Systems to help insure that the public receives emergency assistance in a timely manner. Our investments in this expensive equipment appears to represent an ever increasing waste of money, however, due to the fact that such a large volume of the emergency telephone calls which we receive originate from wireless telephones.

The problem which we experience when we receive wireless telephone calls on our Enhanced 9-1-1 Emergency Telephone Systems is that we **do not receive** a computerized display of the caller's telephone number or location, such as we do receive when we answer calls from traditional landline telephones.

Very often, wireless telephone users do not know their location, or address. Without that critical piece of information, valuable time is wasted trying to determine the exact location of an emergency. We stress to our citizens through public education programs that they should ***"Dial 9-1-1 When Seconds Count!"*** Many times, just a few seconds can mean the difference between life and death for someone who is involved in an emergency situation. Time which is wasted trying to determine the location of an emergency because wireless telephone calls to our Enhanced 9-1-1 Emergency Telephone Systems do not display the caller's location (or telephone number) can, and sometimes does, result in the needless and otherwise preventable loss of life and destruction of property. It also frequently results in the failure to quickly apprehend and arrest criminals. In short, it lessens our ability to achieve many of ***NENA's*** goals: The protection of human life, the preservation of property, and the maintenance of general community security.

Likewise, the inability to obtain the telephone number of wireless telephone users when they dial 9-1-1 robs our Public Safety Telecommunicators of another critical piece of information. Without that telephone number computerized display, we find ourselves unable to call the wireless telephone users back to obtain more information about an emergency. In a Law Enforcement scenario, it also prevents investigators from being able to recontact victims, witnesses, and sometimes even criminals themselves.

The failure of wireless telephones to transmit location and telephone number information to our Enhanced 9-1-1 Emergency Telephone Systems **degrades** those systems to a **very large degree**. As the use of wireless telephones grows by leaps and bounds, there will be a proportional degradation of our Enhanced 9-1-1 Emergency Telephone Systems. That, in turn, will cause more and more of the millions of dollars which have been invested in those systems to be wasted money.

We experience similar problems with 9-1-1 calls which are placed from behind a PBX system switch - we **do not receive** an accurate telephone number for the caller, and we often times receive what turns out to be an **inaccurate address** for the caller.

Because we do not receive an accurate telephone number for the caller, we cannot call them back to try to obtain additional information about an emergency, and we lose the ability to recontact victims, witnesses, and sometimes even criminals themselves.

We often find ourselves wasting valuable time attempting to verify the correct location of an emergency because the computerized display which we receive on our Enhanced 9-1-1 Emergency Telephone System equipment is for the address where the PBX switch is physically located. Often times, that is not the same location where emergency assistance is needed.

Someone who is involved in an emergency situation, and who uses a telephone which is located behind a PBX system switch to dial 9-1-1, may be located at the same address as the PBX system switch, but they might be in some remote location of a very large building. In an emergency situation, valuable time is often wasted trying to determine their exact location within that building - time which can result in the needless and otherwise preventable loss of life and destruction of property. It also can result in the failure to quickly apprehend and arrest criminals.

In many instances, someone who calls 9-1-1 from behind a PBX system switch is located in another building altogether. That building might be located several miles away from the building which houses the PBX system switch, or even in another city, town, or county.

Because the computerized display which we receive for 9-1-1 calls which are placed from telephones which are located from behind a PBX system switch shows the address of that PBX system switch, and not necessarily the actual location where emergency assistance is needed, valuable time is often wasted trying to determine the exact location of the emergency.

Without careful screening of callers by our Public Safety Telecommunicators, it is often very difficult to pinpoint the exact location of an emergency when the caller uses a telephone which is located behind a PBX system switch. Sometimes, the **wrong** Police Department, Fire Department, or Emergency Medical Services personnel are dispatched to the **wrong** address. Then, not only are valuable seconds lost, but often times many minutes are lost before we discover that Emergency Services personnel have been dispatched to the **wrong** address.

The problem is then compounded when we attempt to recontact the caller, only to find that the telephone number which was shown on our Enhanced 9-1-1 Emergency Telephone System's computerized display was for the main office of a business, instead of the individual telephone extension of the caller. A switchboard operator for that business might answer our return call, but that person may have no idea which of their dozens, hundreds or even thousands of employees dialed 9-1-1, or from where. Also, PBX system switchboards are normally staffed in most businesses during regular business hours. If someone working late at night or on weekends or a holiday experiences an emergency and dials 9-1-1, and we need to call them back, we usually get **no answer** because the PBX switchboard operator is not working and there is nobody there to answer our return telephone call.

Just like wireless telephones, the usage of PBX systems is growing rapidly, and will result in further degradation of our Enhanced 9-1-1 Emergency Telephone Systems.

Not only will the degradation of our Enhanced 9-1-1 Emergency Telephone Systems result in the waste of many millions of dollars worth of our investments, it will ultimately result in the tragic, needless, and preventable loss of life, destruction of property, and the failure to apprehend and arrest criminals in a timely manner.

We install and maintain our Enhanced 9-1-1 Emergency Telephone Systems in an effort to assist our citizens whenever they experience an emergency and need help quickly. New developments in technology within the telecommunications industry is threatening to compromise our efforts.

POSITION

On behalf of the ***North Carolina Chapter of NENA's*** Executive Board and its entire general membership, I urge the Federal Communications Commission to take steps to insure the compatibility of wireless telephones and PBX telephones with our Enhanced 9-1-1 Emergency Telephone Systems.

The ***North Carolina Chapter of NENA*** would like to go on record as **supporting** the APCO/NENA/NASNA position regarding the proposed rule making for wireless telephones and PBX telephones. In addition, we **strongly support** the positions which were taken at the TIA/PCIA/APCO/NENA/NASNA Wireless and Emergency Services Joint Experts Meeting held in October 1994, which we believe are in agreement with the APCO/NENA/NASNA position.

The ***North Carolina Chapter of NENA*** would also like to go on record as **supporting** the document which APCO, NENA, and NASNA created in Salt Lake City, Utah on December 4, 1994.

We share the concerns of APCO, NENA, and NASNA regarding the following matters:

- The **negative** effects that wireless communications and the introduction of competition in the local loop will have on Enhanced 9-1-1 Emergency Telephone Systems.
- The fact that advances in the telephone network towards common channel signaling and advanced intelligent network architectures **have not included** Enhanced 9-1-1 Emergency Telephone Systems.
- We **do not believe** that increased competition in this area will benefit our citizens.
- The **negative** effects that PBX telephone systems have on Enhanced 9-1-1 Emergency Telephone Systems.

On behalf of the ***N.C. Chapter of NENA's*** Executive Board and its entire general membership, I would like to request that the Federal Communications Commission **rule decisively** that the telecommunications industry should consider the effects of their designs and products on Enhanced 9-1-1 Emergency Telephone Systems in the United States, and ask that the service providers and equipment and system suppliers be required to work with Public Safety Associations to this end.